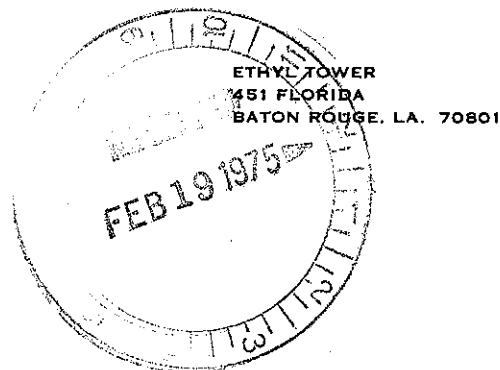


ETHYL CORPORATION

February 15, 1975



Mr. Arthur W. Busch
Regional Administrator
Environmental Protection Agency
1600 Patterson Street - Suite 1100
Dallas, Texas 75201

Ref. Ocean Dumping Permit 730D009B
General Condition No. 10

Dear Mr. Busch:

Pursuant to instructions in Permit 730D009B this is to report the information as required in General Condition No. 10 thereof concerning dumpings that were initiated during the six months period beginning August 16, 1974 through February 15, 1975.

10a Information in the records to be kept pursuant to Paragraph 9 of the General Conditions.

(9a) The material is a waste sodium-calcium sludge, a mixture of solid metallic sodium, metallic calcium and oxides of these metals plus sodium and calcium chlorides. Sodium chloride is used as fill material added first to the bottom of the containing 55 gallon drum before the addition of the waste sodium calcium sludge and then to the top. The sodium chloride fills the void spaces and provides added weight to ensure sinking the drum. Analyses are listed in Exhibit A attached.

(9b) The precise times and locations of dumping are listed in the attached Exhibit B, Paragraph 7b.

(9c) We have no reports of any undesirable effect on the marine environment or human health or welfare in connection with the permitted dumping activities.

10b A summary of the reports required by Paragraph 7 of the General Conditions is given in Exhibit B.



Mr. Arthur W. Busch
February 15, 1975
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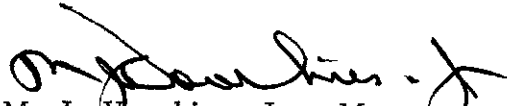
- 10c We have no additional reports or records, covered in Special Conditions of this Permit, to submit.
- 10d A composite sample representative of the barging operations carried out under this permit for the period beginning August 16, 1974 through February 15, 1975 has been analyzed in Ethyl's Chemical Research Laboratory for the paramaters required as follows:

Trace Metal Content of Sodium-Calcium Waste (Composite Sample)
(all analyses reported as mg/kg)

<u>Component</u>	<u>Limits of Detection</u>	<u>Analysis mg/kg</u>
Selenium	1.0	N.D.*
Arsenic	.2	N.D.*
Beryllium	.1	N.D.*
Vanadium	.1	N.D.*
Nickel	.2	N.D.*
Zinc		4.6
Lead		5.5
Copper		4.5
Chromium		0.1

* Below detectable level

Very truly yours,


M. J. Voorhies, Jr., Manager
Production Scheduling and Distribution

GEO:sak
Attach.

CC: Mr. J. H. Huguet

EXHIBIT A

Chemical Analysis of the Material Dumped

Trip No.	No. 5	No. 6	No. 7	No. 8
Permit No.	730D009B	730D009B	730D009B	730D009B
Date Dumped	9-21-74	11-2-74	12-8-74	2-1-75

Component

Sodium (Metal & Oxides)	66.4%	66.8%	68.0%	67.0%
Calcium (Metal & Oxides)	8.4%	8.4%	7.7%	8.7%
Oxygen (in Oxides)	5.3%	5.1%	4.7%	4.4%
Sodium & Calcium Chlorides	19.9%	19.7%	19.6%	19.9%
Cadmium	0.6 ppm	0.3 ppm	0.3 ppm	0.3 ppm
Mercury	< 0.1 ppm	< 0.1 ppm	< 0.1 ppm	< 0.1 ppm

EXHIBIT B

Paragraph 7d Quantity of Material Dumped

Trip No.	No. 5	No. 6	No. 7	No. 8
Permit No.	730D009B	730D009B	730D009B	730D009B
Date of Dumping	9-21-74	11-2-74	12-8-74	1-2-75
Number of Drums	700	700	648	700
<u>Parts Per Million of Each Constituent</u>				
Sodium (in Metal & Oxides)	664,000 ppm	668,000 ppm	680,000 ppm	670,000 ppm
Calcium (in Metal & Oxides)	84,000 ppm	84,000 ppm	77,000 ppm	87,000 ppm
Sodium & Calcium Chlorides	199,000 ppm	197,000 ppm	196,000 ppm	199,000 ppm
Oxygen (in Oxides)	53,000 ppm	51,000 ppm	47,000 ppm	44,000 ppm
Cadmium	0.6 ppm	0.3 ppm	0.3 ppm	0.3 ppm
Mercury	*0.1 ppm	< 0.1 ppm	*0.1 ppm	*0.1 ppm
Total	1,000,000	1,000,000	1,000,000	1,000,000
<u>Pounds of Each Constituent</u>				
Sodium (in Metal & Oxides)	230,076 lbs.	231,462 lbs.	218,117 lbs.	232,155 lbs.
Calcium (in Metal & Oxides)	29,106 lbs.	29,106 lbs.	24,699 lbs.	30,146 lbs.
Sodium & Calcium Chlorides	68,953 lbs.	68,260 lbs.	62,868 lbs.	68,953 lbs.
Oxygen (in Oxides)	18,365 lbs.	17,672 lbs.	15,076 lbs.	15,246 lbs.
Cadmium	*0.21 lbs.	0.10 lbs.	0.10 lbs.	0.10 lbs.
Mercury	0.03 lbs.	< 0.03 lbs.	*0.03 lbs.	*0.03 lbs.
Total	346,500	346,500	320,760	346,500

* Should be "less than" but sign (<) inadvertently omitted in our first report.

Paragraph 7b Time & Location of Barging & Dumping

Trip No. Permit No.	No. 5 730D009B	No. 6 730D009B	No. 7 730D009B	No. 8 730D009B
<u>Commenced Dumping</u>				
Date	9-21-74	11-2-74	12-8-74	2-1-75
Time	0730 hrs. CDT	0700 hrs. CST	0700 hrs. CST	0715 hrs. CST
North Latitude	28 deg. 8 min.	28 deg. 8 min.	28 deg. 9 min.	28 deg. 8 min.
West Longitude	89 deg. 23 min.	89 deg. 27 min.	89 deg. 26 min.	89 deg. 29 min.

Ceased Dumping

Date	9-21-74	11-2-74	12-8-74	2-1-75
Time	1130 hrs. CDT	1030 hrs. CST	1000 hrs. CST	1215 hrs. CST
North Latitude	28 deg. 10 min.	28 deg. 3 min.	28 deg. 6 min.	28 deg. 4 min.
West Longitude	89 deg. 29 min.	89 deg. 17 min.	89 deg. 18 min.	89 deg. 29 min.
Midpoint when operation extended over six hours	Less than 6 hours	Less than 6 hours	Less than 6 hours	Less than 6 hours

Paragraph 7c Departure and Return

Trip No. for Permit 730D009B	No. 5	No. 6	No. 7 (a)	No. 8 (b)
Date Departure Baton Rouge	9-19-74	10-31-74	12-5-74	1-23-75
Time Departure	1630 hrs. CDT	1600 hrs. CST	1600 hrs. CST	1600 hrs. CST
Date Returned Lockport	9-22-74	11-3-74	12-9-74	2-2-75
Time Returned	0400 hrs.	0800 hrs.	0500 hrs.	0700 hrs.

(a) Delayed one day by weather. Reported by wires of December 3 and December 6, 1974.

(b) Delayed 7 days by weather reported by wires of January 27, January 29, January 30 and January 31, 1975.